

ETEXT ATTACHMENT

[BeginText]

11/21/2006 16 : 22

November 21, 2006

Ms. Kristin DeCarmine
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Keeping America's Promise, Inc.
FEC ID No. C00409508

Dear Ms. DeCarmine:

This is in response to your letter dated November 8, 2006 concerning the September Monthly Report (8/1/06-8/31/06) of Keeping America's Promise (the "Committee").

You have asked about the payments from federal candidate committees to the Committee for goods or services performed. The Committee has assessed the "usual and normal charge" for services by passing on the credit card processing fees charged by its merchant account vendor and the standard fee charged by its compliance vendor directly to the federal candidate committees for whom it processes earmarked contributions. These fees are paid by the federal candidate committees receiving the earmarked funds to ensure that an in-kind contribution from the Committee does not occur.

You have also asked about expenditures made by the Committee for "Communications Consulting Services," "Telemarketing Services" and "Direct Mail Services." The expenses you cite were made to conduct the Committee's own programs and activities and none contained express advocacy.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Marc E. Elias
Counsel
Keeping America's Promise, Inc.
[EndText]